

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

PLYMOUTH COUNTY
CONTRIBUTORY RETIREMENT
SYSTEM,

Plaintiff,

v.

FRED HASSAN, et al.,
Defendants.

Civil Action No. 2:08-cv-01022-
DMC-JAD

Hon. Dennis M. Cavanaugh

**NOTICE OF MOTION FOR FINAL APPROVAL OF SETTLEMENT AND
MOTION FOR AWARD OF ATTORNEY'S FEES AND EXPENSES**

To: All Persons on ECF Service List

COUNSEL:

PLEASE TAKE NOTICE that on February 28, 2012 at 9:30 A.M. or as soon as counsel may be heard, the undersigned counsel for Lead Shareholder Derivative Plaintiff, in the above-captioned matter shall move pursuant to Rule 23.1 of the Federal Rules of Civil Procedure before the Honorable Dennis M. Cavanaugh at the United States District Court for the District of New Jersey, Post Office and Courthouse Building, 2 Federal Square, Newark, NJ, Court Room 4, for entry of an order granting final approval of the settlement of the above-captioned lawsuit in accordance with the Stipulation of Settlement. In addition, Plaintiff, by and through counsel, hereby moves this Court for an award of attorneys' fees and

expenses in the amount of \$5.1 million.

In support of these motions, Plaintiff intends to rely upon the following documents:

1. Memorandum of Law in Support of Plaintiff's Motion for Final Approval of Settlement;
2. Memorandum of Law in Support of Motion for Award of Attorneys' Fees and Expenses;
3. Declaration of William R. Farmer in support of the Motions;
4. Declaration of Walter O'Malley in support of the Motions; and
5. Declaration of Judith S. Scolnick in support of the Motions, with accompanying Exhibits A-L.

The undersigned hereby request oral argument scheduled for February 28, 2012 at 9:30 a.m. pursuant to this Court's Order preliminarily approving the settlement (ECF No. 141) entered on January 10, 2012.

Dated: February 21, 2012

BECKWITH & WOLF, LLP

By: /s/ Carl C. Beckwith
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on February 21, 2012, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List, and I hereby certify that I caused the foregoing document or paper to be mailed via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List.

I certify under penalty of perjury that the foregoing is true and correct.
Executed on February 21, 2012.

BECKWITH & WOLF, LLP

By: /s/ Carl C. Beckwith
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Attorney for Plaintiff